

EXHIBIT 7



Proskauer Rose LLP 1001 Pennsylvania Avenue, NW Suite 600 South Washington, DC 20004-2533

September 30, 2015

Colin Kass
Member of the Firm
d 202.416.6890
f 202.416.6899
ckass@proskauer.com
www.proskauer.com

Via E-Mail

Ronnie S. Spiegel
Hagens Berman Sobol Shapiro LLP
1918 Eighth Ave., Suite 3300
Seattle, WA 98101
ronnie@hbsslaw.com

Re: *In re Automotive Parts Antitrust Litigation* (Master Case No. 2:12-md-02311)

Dear Ronnie:

Please see enclosed a proposed agenda for the summit on Friday.

Sincerely,

/s/ *Colin Kass*

Colin Kass

Enclosure

cc: Katherine Van Dyck (via e-mail, kvandyck@cuneolaw.com)
Sheldon Klein (via e-mail, klein@butzel.com)



September 30, 2015

Agenda for October 2, 2015 “Summit” Meet & Confer¹

- I. General Approach**
- II. Non-OEM SSEs²**
- III. Facial Overbreadth / Particularized Need**
- IV. Reimbursement of Costs and Expenses**
- V. Time Period / Scope**
- VI. Custodians**
- VII. Timing (if needed) of Formal Written Objections & Responses.**

¹ This is not meant to be a comprehensive list of all objections to the Subpoena, but rather highlights a number of issues that are appropriate for an initial discussion between the SSEs and the Parties. Any proposal set forth herein is non-binding, for discussion purposes only, and subject to a comprehensive agreement among the SSEs and the Parties. Any such proposal shall not be deemed an admission that such proposal (or discovery generally) is reasonable, proportional, or appropriate, but rather is being raised as a means for reaching an accommodation among the SSEs and the Parties. Each SSE reserves the right to object to the entire subpoena (or portions thereof) if no comprehensive agreement satisfactory to it can be reached. The SSEs also reserve the right to modify any proposal until a written agreement has been finalized.

² The non-OEM SSEs include, but may not be limited to, the following entities: (i) Chrysler Non-OEM SSEs (Maserati N.A., Inc.; Fiat Finance North America, Inc.; and Chrysler Transport Inc.); (ii) Toyota Non-OEM SSEs (Toyota Motor North America, Inc.; Toyota Motor Manufacturing Alabama, Inc.; Toyota Motor Manufacturing Indiana, Inc.; Toyota Motor Manufacturing Kentucky, Inc.; Toyota Motor Manufacturing Mississippi, Inc.; Toyota Motor Manufacturing Texas, Inc.; Toyota Motor Manufacturing West Virginia, Inc.; Toyota Logistics Services, Inc.; and Caltex Design Research, Inc.); (iii) BMW Non-OEM SSEs (BMW of North America, LLC, BMW Manufacturing Co., LLC, BMW Financial Services NA LLC, BMW (US) Holding Corp., BMW Bank of North America, BMW Insurance Agency, Inc., BMW US Capital, LLC, Designworks/USA, Inc.); (iv) Porsche Cars North America, Inc.; (v) Hyundai / Kia Non-OEM SSEs (Hyundai Capital America; Hyundai Motor America; Hyundai Motor Manufacturing Alabama, LLC; Hyundai-Kia America Technical Center, Inc.; Kia Motors Manufacturing Georgia, Inc.; Kia Motors America, Inc.; Hyundai Autoever America, LLC); (vi) VW Non-OEM SSEs (Volkswagen Group of America, Inc., also d/b/a Audi of America LLC; Volkswagen Credit Inc.; Automobili Lamborghini America LLC; and Bentley Motors, Inc.); (vii) Nissan Non-OEM SSEs (Nissan Design America, Inc.; Nissan Technical Center North America, Inc.; Nissan Diesel America, Inc.; and Nissan Motor Acceptance Corporation); (viii) Honda Non-OEM SSEs (American Honda Finance Corp.; Honda North America, Inc.; Honda of South Carolina Mfg., Inc.; Honda Precision Parts of Georgia, LLC; Honda R&D Americas, Inc.; Honda Research Institute USA, Inc.; Honda Transmission Manufacturing of America, Inc.); (ix) Rolls-Royce Motor Cars NA, LLC; (x) Jaguar Land Rover North America, LLC; (xi) Volvo Cars of North America, LLC; (xii) Subaru Non-OEM SSEs (Subaru of America, Inc.; Subaru Leasing Corp.; and Fuji Heavy Industries U.S.A., Inc.); (xiii) Aston Martin Lagonda of North America, Inc.